

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION

This document relates to:
All Actions

No. 19-md-2875-RBK

Honorable Robert Kugler
Special Master Thomas Vanaskie

**CERTIFICATION OF ADAM M.
SLATER IN SUPPORT OF PLAINTIFFS’
REPLY BRIEF FOR RULE 37
SANCTIONS AGAINST ZHP**

I, ADAM M. SLATER, hereby certify as follows:

1. I am an attorney at law of the State of New Jersey, and a partner at the law firm of Mazie Slater Katz & Freeman, LLC, attorneys for Plaintiffs. I make this Certification in support of Plaintiffs’ reply brief for Rule 37 sanctions against ZHP.

2. The facts set forth in this certification are based upon my personal knowledge, information, and belief, unless otherwise stated.

3. Attached hereto as **Exhibit 55** is a true and accurate copy of ZHP’s litigation hold disclosure.

4. Attached hereto as **Exhibit 56** is a true and accurate copy of Solco’s Press Release The FDA Has Officially Removed Zhejiang Huahai Pharmaceutical From Import Alert, dated November 16, 2021, <https://www.solcohealthcare.com/the-fda-has-officially-removed-zhejiang-huahai-pharmaceutical-from-import-alert-2/>.

5. Attached hereto as **Exhibit 57** is a true and accurate copy of Solco's Product List, <http://www.stage.solcohealthcare.com/wp-content/uploads/2019/08/Solco-Product-Catalog-08-13-19.pdf>.

6. Attached hereto as **Exhibit 58** is a true and accurate copy of a February 4 through 8, 2022 email chain between ZHP's and Plaintiffs' counsel.

7. Attached hereto as **Exhibit 59** is a true and accurate copy of two February 9, 2022 emails between ZHP's and Plaintiffs' counsel.

I hereby certify that the aforementioned statements made by me are true. I am aware that if any of the aforementioned statements made by me are willfully false, I am subject to punishment.

Dated: February 18, 2022.

Respectfully Submitted,



Adam M. Slater (NJ Bar 046211993)
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